David M. Christian Vice President - Regulatory Affairs

September 17, 2007



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Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Ms. Ann Cole. Commission Clerk

Re: VERIZON REQUEST FOR WAIVER OF NUMBERING DENIAL

Dear Ms. Cole:

Verizon Florida LLC (Verizon) is preparing to deliver services to customers in the state of Florida using new packet switching equipment. This process is part of Verizon's transformation to an advanced broadband network. In some installations, when a customer purchases Verizon's FiOS high speed internet service, the customer's existing voice service will be moved from the existing end office circuit switch to the newly installed packet switch. There will be no changes to the customer's voice service or rates.

The new packet switch is not replacing the existing circuit switch but rather it will function in parallel with the existing circuit switched network. In order for Verizon to begin offering service to its customers using the new packet switch by January 2008 Verizon must start system test and verification in November 2007. Verizon requests a waiver to permit the assignment of the required Location Routing Number (LRN) in the 952 LATA in order to support Local Number Portability (LNP) and Telephone Number Pooling (TNP).

On August 20, 2007, Verizon applied to the Pooling Administrator (PA) for a new thousand's block of numbers. The application was denied because Verizon's application did not satisfy the Months-to-Exhaust and Utilization criteria to be assigned a thousands-block from a new NXX code. Verizon requests that the Commission use its delegated authority to waive the Months-to-Exhaust and Utilization requirements so that Verizon may be assigned the required NXX code to create one LRN in the LATA identified above. Verizon will return nine unused thousands-blocks in the NXX code to the appropriate rate center pool.

DOCUMENT NUMBER-DATE

08441 SEP 17 5

In support of this request, see the following attachments:

- Central Office Code (NXX) Assignment Request Part 1
- CO Code Assignment Months to Exhaust Certification Worksheet TN Level Appendix B
- Pooling Administration System utilization calculation of 63.909%

Joan Gage can be reached on 813-483-2530 if you have any questions.

Sincerely, Christian W

David M. Christian Vice President

Regulatory Affairs Florida

Attachments

Central Office Code Assignment Guidelines(COCAG) Central Office Code(NXX) Assignment Request - Part 1 (ATIS-0300050.p1) December 9,2005

Irac	king Number: FLVV0002004								
Ту	pe of Application:	⊠ New	☐ Change ¹	☐ Delete					
1.0	GENERAL INFORMATION								
1.1	Contact Information:								
Code Com Head City, Con City, Phor	e Applicant: npany/Entity Name: dquarters Address: State,Zip: tact Name: tact Address: State,Zip: ne: 973-399-5528 e Administrator ² : ne:	VERIZON FLORIDA INC. 1 E. PRATT ST. 3E BALTIMORE,MD 21202 Barbara Ingram 900 Clinton Avenue 1st Floor Irvington ,NJ 07111 C: E-Mail: barbara.j.i Beth Sprague 46000 Center Oak Plaza	ngram@core.verizon.com						
	State,Zip:	Sterling ,VA 20166							
-		c: 571-434-5502							
									
1.2	NPA: 813 NXX ³ : LATA: 952 OCN ⁴ : 0328 Parent Company's OCN(s): NONE Switching Identification (Switching Entity/POI) ⁵ : TAMPFLXAPSA Locality/City/Wire Center: TAMPA MAIN C.O 1611 Rate Center ⁶ : TAMPA CENTRAL Homing Tandem Operating Co. ⁷ : VERIZON Tandem Homing CLLI ^{TM 8} : TAMPFLXA02T								
1.3	Dates: Date of Application: §	3/20/2007 Reques	ted Effective Date ^{9 10} : 9/20	0/2007					
1.4	_	(e.g., Cellular - Type 2) ace (Optional) b, if any	er Tandem Homing						
1.5	Type of Request (Initial, grow If an initial code, attach (1) ev If a growth code, attach mont	idence of certification and (2) p	roof of ability to place cod	e in service within 60 days.					
	Pool Indicator ¹³ :⊠Yes	\beth_{No}							
1.6	NPA Jeopardy Criteria Apply	: □Yes□No							

Central Office Code Assignment Guidelines(COCAG) Central Office Code(NXX) Assignment Request - Part 1 (ATIS-0300050.p1) December 9,2005

1.7 (Code request for new service (Explain): <u>Code</u>	Request for an LRN	
1.8	Part 2 attached	⊠Part 2 is not attached for Bl	RRDS ^{14 15}
	Additional Documentation is attached	☐ Additional Documentation i	s not attached
Comm	ents:	····	
	y certify that the above information requesting	•	•
	s application has been prepared in accordant ATIS Web Site (http://www.atis.org/atis/clc/ind	•	·
		Code Administrator	8/20/2007
	Barbara Ingram Signature of Code Applicant	Code Administrator	8/20/2007
	Signature of Code Applicant	Title	Date

Central Office Code Assignment Guidelines(COCAG) Central Office Code(NXX) Assignment Request - Part 1 (ATIS-0300050.p1) December 9,2005

⁴Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (973-884-8355) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the TelcordiaTM Routing Administration (TRA) on 732-699-6700.

⁵This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character TelcordiaTM COMMON LANGUAGE CLLITM Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)

⁶Rate Center name must be a tariffed Rate Center associated with toll billing.

⁹Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

¹Identify type and reason for change(s) in Section 1.4(e).

²A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³The NXX field is required for any code request in which there is a change or the NXX is being returned.

Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

TMTelcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.

⁸This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLITM Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

¹⁰Requests for code assignment should not be made more than six months prior to the requested effective date.

¹¹Select if you are the current Code Holder.

¹²Select if you are not the current Code Holder.

¹³The Applicant will indicate "Yes" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

¹⁴Applicant is not required to submit Part 2 of the code request form if it is doing its own Telcordia TM Business Integrate Routing and Rating Database System (BIRRDS) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.

¹⁵WARNING! It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45 calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.

¹⁶An incomplete form may result in delays in processing this request.

Effective June 11,2001 Appendix B

CO CODE ASSIGNMENT

MONTHS TO EXHAUST CERTIFICATION WORKSHEET - TN Level

(Worksheet to be used for Requests for Additional Codes for Growth)

Date: 8/20/2007 Company Name:

Rate Center: TAMPA CENTRAL

NPA(s)-NXXs included in growth calculation: 2 See Attached List

Signature of Authorized Representative of Code Applicant: Robert Janke

Title:	<u>Manager</u>					Teleph	one No:	972-318-530	00	FAX No:	972-31	7-2161	
A.	Telephone Numbers (TNs) Available for Assignment (See Glossary ³):		40894										
		Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month
	,	#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12
B.	Previous 6-month growth history ⁴	-568	-74	-404	<u>-43</u>	<u>-56</u>	<u>65</u>						
C.	Forecast – Next months 1-12 ⁵	<u>-568</u> <u>71</u>	<u>-74</u> <u>127</u>	<u>61</u>	55	<u>87</u>	145	<u>103</u>	<u>40</u>	<u>81</u>	<u>26</u>	<u>107</u>	<u>68</u>
D.	Average Monthly Forecast (Sum of months 1-6 Part C above divided by 6): 91												
E.	Months to Exhaust ⁶	Telephone Numbers (TNs) Available			able for Assi	gnment(A)	=	449.4					
	_	Average Montly Forec			ecast (D)								
F.	Utilization Level ⁷	Telephone Numbers (TNs) Assig			Ns) Assigne	d	* 100 =	71.61					
	Total Numbering Resources in Applicant's Inventory												

Explanation:

¹ A copy of this worksheet is required to be submitted to the Code Administrator; for audit purposes, it must be in the applicant's files.

² Report on all resources for the requested geographic area, including newly acquired codes.

³ Definitions of terms may be found in the Glossary section of the Central Office Code (NXX) Assignment Guidelines.

⁴ Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

⁵ Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁶ To be assigned an additional CO Code (NXX) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).

⁷ Newly acquired numbers (see glossary) may be excluded from the utilization calculation (FCC 00-104, § 52.15 (g) (3) (ii)).

Effective June 11,2001 Appendix B

NPA(s)-NXX-Xs included in growth calculation:

813-202, 813-204, 813-216, 813-218, 813-221, 813-222, 813-223, 813-224, 813-225, 813-226, 813-227, 813-228, 813-229, 813-275, 813-314, 813-318

